

REMARKS

Claims 1-23 are pending in the present application and stand rejected. The Examiner's reconsideration is respectfully requested in view of the above amendment and the following remarks.

Claims 1-23 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Gopal *et al.* (U.S. Patent No. 5,491,817) (hereinafter Gopal). The rejection is respectfully traversed.

The Office Action cites col. 6, lines 39-44 of Gopal as teaching "is capable of having different values for at least two of a plurality of different contexts," as essentially claimed in claim 1. Col. 6, lines 39-44 of Gopal state: "users can access information about an object in one context by knowing information about the object in another context." The Office Action argues that this somehow teaches having different values for at least two different contexts. Applicants respectfully disagree. The fact that a user can access information about an object in one context by knowing information about the same object in another context simply means that the two different contexts are interrelated. That is, an interrelation allows one context to be determined by information of another context. Gopal does not explicitly teach or suggest that the two different contexts are capable of having different values. Any argument that Gopal teaches or suggests such limitations would be entirely speculative and outside the bounds of a *prima facie* obviousness rejection. As such, Gopal does not teach or suggest "is capable of having different values for at least two of a plurality of different contexts," as essentially claimed in claim 1.

The Office Action cites col. 6, lines 54-58 and lines 39-44 of Gopal as teaching "maintaining a cache directory structure in which at least two different values are capable

of being associated with at least one of the plurality of objects, each of the at least two different values corresponding to a different context,” as essentially claimed in claim 1.

This citation poses numerous problems.

First, Gopal does not teach or suggest “maintaining a cache directory structure.” Such a structure is entirely and clearly absent from the disclosure of Gopal.

Second, Gopal does not teach or suggest “at least two different values are capable of being associated with least one of a plurality of objects.” The Office Action’s citation of col. 6, lines 54-58 of Gopal do not provide a teaching or suggestion. Col. 6, lines 54-58 of Gopal disclose a unique linking identifier for controlling data redundancy among separate directories. That is, in a network of linked, separate directories, the unique linking identifier guarantees that one linked directory will not contain the same information as another linked directory. Nothing in the referenced citation explicitly teaches or suggests that “at least two different values are capable of being associated with least one of a plurality of objects.” Any argument that the referenced citation teaches or suggests such limitations would be entirely speculative and outside the bounds of a *prima facie* obviousness rejection.

Third, as previously addressed, col. 6, lines 39-44 of Gopal clearly do not teach or suggest “each of the at least two different values corresponding to a different context.”

It should be noted that the Office Action admits that Gopal “fails to explicitly teach of at least one cache and storing the identified object in the at least one cache.” Applicants respectfully assert that from the admission, it necessarily follows that Gopal fails to teach or suggest “maintaining a *cache directory structure...*” and “identifying an object to *be cached...*”

In arguing the 103(a) rejection, the Office Action failed to properly follow the guidelines for maintaining a *prima facie* obviousness rejection. In particular, the Office Action failed to address: (a) the prior art *must* suggest the desirability of the claimed invention; and (b) there *must* be some suggestion or motivation in the prior art or within the knowledge generally available to one of ordinary skill in the art to modify the prior art.

Gopal does not suggest a desirability of the claimed invention. The Office Action argues, without citation, that “using cache is commonly known in the art at the time the invention was made[;]...[t]herefore, it would have been obvious for one ordinary skill in the art at the time the invention was made to use part of the main memory as cache to use frequently used data over and over.” This argument is absolutely fraught with problems.

First, Gopal does not teach or suggest to use of any “main memory.” It is entirely unclear what the Office Action means when it refers to a “main memory.” Gopal teaches a linking system for enhancing directory service in a network of directories. Applicants are perplexed by how Gopal would use and/or perform the steps of claim 1. In fact, Applicants respectfully assert that modifying Gopal to perform the steps of claim 1 would change the principle of operation of Gopal. Further, Applicants respectfully assert that modifying Gopal as such would also render Gopal unsatisfactory for its purpose (*i.e.*, a linking system for enhancing directory service in a network of directories). It is also entirely unclear what data can “frequently used...over and over,” as the Office Action argues.

Second, assuming that “cache is commonly known in the art at the time the invention was made,” as the Office Action argues, it is irrelevant to an obviousness rejection whether one component of a claim is well known in the art. This is because the

Office Action must specifically address *each and every* limitation of claim 1. The Office Action has failed to do so. The Office Action must show at least “a method for caching at least some of the plurality of objects”; “maintaining a cache directory structure”; “identifying an object to be cached”; and “storing the identified object in the at least one cache.” Simply arguing that a cache *by itself* is well known in the art does not address the specific limitations of claim 1. Further, the mere fact that Gopal *can* be modified, as the Office Action seemingly argues, does not render the resultant combination obvious *unless* the prior art also suggests the desirability of the modification. The Office Action has failed to show any such desirability in Gopal.

Gopal does not provide any sufficient suggestion or motivation to modify itself. The motivation provided by the Office Action that “one ordinary skill in the art at the time the invention was made to use a part of the main memory as cache to use frequently used data over and over” is incomplete and irrelevant. As previously mentioned, Gopal does not disclose a “main memory.” Further, the Office Action does not specify what “data” that Gopal discloses would one skilled in the art use “over and over.”

The arguments above apply, at least in part, for independent claims 11 and 17. Applicants further argue that in claim 11, the Office Action fails to address the claim limitations “propagating the at least one of the plurality of values to at least one other context from among the plurality of contexts, wherein the at least one object has identical dependencies in the context and the at least one other context.” Applicants further argue the Office Action fails to address each and every claim limitation of claim 17. Each and every limitation must be addressed, which has not been done in the Office Action. In particular, the Office Action needs to address the step of “propagating...” as essentially

claimed in claim 11, and the steps of “recording...,” “realizing...,” and “replaying...,” as essentially claimed in claim 17.

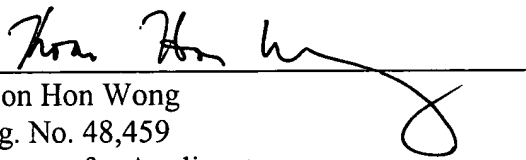
The Office Action briefly mentions “the one dependency between the at least one object and the underlying data, and identical dependency.” First, this is entirely improper as the Office Action fails to address each and every limitation of the claims 11 and 17. Second, the Office Action’s citation of col. 8, lines 46-57 provide no basis for teaching or suggesting any of the limitations of claims 11 and 17. Without addressing each and every limitation of claims 11 and 17 with respect to its citations of Gopal, the Office Action has rendered its own arguments moot.

With respect to independent claim 20, the Office Action has entirely failed to address *any* of its limitations. That is, the Office Action fails to address “at least one client,” “at least one server,” “a cache adapted to allow multiple copies of a same object to be cached under different contexts,” and “a context manager adapted to manage the different contexts.”

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. In light of the above, it is clear that the Office Action has failed to establish a *prima facie* case of obviousness.

Accordingly, independent claims 1, 11, 17, and 20 are believed to be patentably distinguishable and nonobvious in view of Gopal. Dependent claims 2-10, 12-16, 18-19, and 21-23 are believed to be allowable for at least the reasons given for claims 1, 11, 17, and 20. Withdrawal of the rejection of 1-23 under 35 U.S.C. §103(a) is respectfully requested.

Respectfully submitted,

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